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February 8, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: ET Docket No. 98-153 - Ultra-Wideband
Ex Parte Notice

Dear Mr. Caton:

On February 7, 2002, on behalf of Time Domain Corporation, Richard Wiley of this firm and I spoke by telephone with Julius Knapp, Deputy Chief of the Office of Engineering and Technology. We noted that in consideration of the emissions mask for ultra-wideband, the -12 dB point should fall at about 2 GHz if the tracking, ranging, and communications benefits of UWB were to be realized. We also mentioned that the FCC's measurement procedures employing an open air test site to assess field strength levels involved a maximization procedure that would effectively decrease the erp of the measured signal by up to 6 dB to account for reflections. Finally, we noted our understanding that government agencies concerned about possible interference from UWB may have a wholly unrealistic view as to the range of UWB systems that would operate at the Part 15 limits under consideration in this proceeding.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. §1.1206, an original and a copy of this letter have been submitted for inclusion in the public record. Please contact me at the phone number listed above if you have any questions concerning this letter.

Respectfully,

David E. Hilliard
Counsel for Time Domain Corporation

cc: Mr. Julius Knapp (via email)

David E. Hilliard
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